

REMARKS/ARGUMENTS

Claims 273-300 are pending in the present application. Claims 1-272 were previously canceled without prejudice. Applicant hereby amends claims 273, 278-287, and 296-298. Applicant respectfully requests re-examination and re-consideration of pending claims 273-300.

I. Rejection of Claims 273-300 Under 35 U.S.C. § 101

The Examiner has rejected claims 273-300 as being directed to non-statutory subject matter, that is, for claiming "modules" that have not been defined as either hardware or software. Applicant has amended claims 273, 278, 280-284, 286, and 296-298 to recite for the currently claimed embodiments that the respective module comprises software code executed by a processor. Applicant respectfully submits that the Examiner's rejection under 35 U.S.C. 101 is obviated.

II. Rejection of Claims 273, 280 and 286 Under 35 U.S.C. § 112

The Examiner has rejected claims 273, 280 and 286 under 35 U.S.C. 112 for referring to a trademark, trade name or standard, specifically to "United States Postal Service" or "USPS". Applicant has amended the subject claims to delete the references to "United States Postal Service" and "USPS". Applicant respectfully submits the Examiner's rejection under 35 U.S.C. 112 is obviated.

III. Rejection of Claims 273-300 Under 35 U.S.C. § 103

The Examiner has rejected claims 273-300 under 35 U.S.C. 103 as being unpatentable over "Whitehouse" (US 6,005,945) in view of "Wells" (aka Sudia: US 5,799,086) and "LeCarpenter" (US 4,752,950). Applicant respectfully disagrees. Applicant submits that independent claims 273, 280 and 286 (as amended) are allowable over the cited references, taken alone or in combination, for at least the following reasons. Whitehouse, Wells and LeCarpenter, alone or in combination, fail to teach or suggest a system or method in which a postage vendor system comprises a plurality of encrypted user account records that each comprise a user private key for digitally signing postal indicia data of postage purchased by a respective user. Further, none of the cited references teach or suggest a cryptographic device used in the processing of postage requests to authenticate a postage request, to access an encrypted user account record, and to update an encrypted user account record.

With respect to the encrypted user account record comprising a private user key for digitally signing postal indicia data, Wells (aka Sudia) does not address postage vending systems, and is limited in its teachings to encryption/decryption of communications. LeCarpenter, while relating generally to franking systems, does not teach or suggest any application for digital signatures on postal indicia. Finally, whereas Whitehouse relates to postage vending systems, Whitehouse does not specifically teach or suggest

encrypting user account records, let alone including user private keys in such user account records. In fact, Whitehouse teaches that the postage vending system use a reduced number of keys for digitally signing postal indicia data, e.g., on a time-based rotation, and that a key ID be placed in a usage log to note which key was used for a particular postage transaction. Whitehouse thus teaches away from storing in each encrypted user account record a user private key for digitally signing postal indicia data of postage purchased by the respective user.

Following on the lack of teaching for a user private key in each encrypted user account record, none of the cited references teach or suggest using a cryptographic device as recited in independent claims 273, 280 and 286. As stated above, Wells (aka Sudia) does not address postage vending systems, and thus, apart from encryption of general communications, does not teach or suggest using a cryptographic device in connection with processing postage requests, particularly with respect to accessing and updating encrypted user account records. LeCarpenter processes postage requests at local meters, and thus has no purpose for using a cryptographic device to access encrypted user account records in a database to process postage requests. Whitehouse also does not teach or suggest the encryption of user account records, or the use of a cryptographic device for accessing or updating encrypted user account records in connection with processing a postage request. Whitehouse encrypts/decrypts

communications between a client and the secure central computer, but does not speak to encryption within the secure central computer.

For at least the foregoing reasons, Applicant respectfully submits that independent claims 273, 280 and 286 are allowable over the cited art. Further, dependent claims 274-279, 281-285 and 287-300, being dependent upon allowable base claims, are also allowable for at least the foregoing reasons.

IV. Conclusion

For the foregoing reasons, Applicant submits that the Examiner's rejections have been traversed. The present application is therefore in condition for allowance. Applicant respectfully requests that a timely Notice of Allowance be issued in this case.

Respectfully submitted,

THE HECKER LAW GROUP

Date: February 7, 2006

By: Todd N. Snyder
Todd N. Snyder
Reg. No. 41,320

THE HECKER LAW GROUP, PLC
1925 Century Park East
Suite 2300
Los Angeles, California 90067
(310) 286-0377

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Frances Scardino February 7, 2006
Signature: Frances Scardino Date